

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
RAS Citron, LLC 130 Clinton Road, Suite 202 Fairfield, NJ 07004 Telephone Number 470-321-7112 Attorneys For Secured Creditor Larura Eggerman, Esq. (LE-8250)	CASE NO.: 17-19196-ABA CHAPTER 11 Objection to Confirmation of Debtor's Chapter 11 Plan
In Re: David Ristick Debtor.	

OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 11 PLAN

NEW PENN FINANCIAL, LLC DBA SHELLPOINT MORTGAGE SERVICING ("Secured Creditor"), by and through its undersigned counsel, objects to confirmation of Debtor's Chapter 11 Plan (Docket No. 160), and states as follows:

1. Debtor, David Ristick, ("Debtor"), filed a voluntary petition pursuant to Chapter 11 of the Bankruptcy Code on May 3, 2017.
2. Secured Creditor holds a security interest in the Debtor's real property located at 5 NOTTINGHAM WAY, TURNERSVILLE, NJ 08012 (the "Property"), by virtue of a Mortgage recorded on September 14, 2005 in Book 9001, at Page 95 of the Public Records of Gloucester County, NJ. Said Mortgage secures a Note in the amount of \$210,400.00.
3. The Debtor filed a Plan of Liquidation on April 18, 2019 ("Plan").
4. Secured Creditor filed a secured proof of claim (Claim No. 8) on June 12, 2017 with a total claim amount of \$137,156.08 and arrears of \$16,060.19.
5. The Plan states the claim will be allowed in the amount filed and will be paid at closing of the sale of the Property.
6. Secured Creditor objects to this treatment as the property is not adequately protected in the interim of a sale.

7. Secured Creditor further objects as there is no mention of maintaining property insurance and tax payments.

WHEREFORE, Secured Creditor respectfully requests this Court sustain the objections stated herein and deny confirmation of Debtor's Plan, and for such other and further relief as the Court may deem just and proper.

RAS Citron, LLC
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By: /s/ Laura Egerman
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CERTIFICATION OF SERVICE

1. I, Laura Egerman, Esq., represent NEW PENN FINANCIAL, LLC DBA SHELLPOINT MORTGAGE SERVICING in this matter.
2. On August 20, 2019, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below. Objection to Confirmation of Debtor's Chapter 11 Plan.
3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

August 20, 2019

RAS Citron, LLC
Attorney for Secured Creditor
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Fairfield, NJ 07004
Telephone Number 470-321-7112

By: /s/ Laura Egerman
Laura Egerman, Esquire
NJ Bar Number LE-8250
Email: legerman@rasnj.com

<u>Name and Address of Party Served</u>	<u>Relationship of Party to the Case</u>	<u>Mode of Service</u>
Jerrold Kulback Archer & Greiner, PC Three Logan Square 35th Floor 1717 Arch Street Philadelphia, PA 19103	Attorney for Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
David Ristick 5 Samantha Court Sewell, NJ 08080	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
Jeffrey M. Sponder Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)